

<b>PHA 5-Year and Annual Plan</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 4/30/2011</b>
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### **1.0 PHA Information**

PHA Name: **Cuyahoga Metropolitan Housing Authority**

PHA Code: OH003

PHA Type: ☐ Small ☐ High Performing ☒ Standard

☐ HCV (Section 8)

PHA Fiscal Year Beginning: (MM/YYYY): 01/2010

### **2.0 Inventory** (based on ACC units at time of FY beginning in 1.0 above)

Number of PH units: 10,253

Number of HCV units: 14,236

### **3.0 Submission Type**

☒ 5-Year and Annual Plan

☐ Annual Plan Only

☐ 5-Year Plan Only

### **4.0 PHA Consortia** ☐ PHA Consortia: (Check box if submitting a joint Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
PHA 1:					
PHA 2:					
PHA 3:					

### **5.0 5-Year Plan.** Complete items 5.1 and 5.2 only at 5-Year Plan update.

**5.1 Mission.** State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years:

"The mission of the Cuyahoga Metropolitan Housing Authority is to be the leader in providing safe quality affordable housing for individuals and families of Cuyahoga County."

**5.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

#### **A: Increase the availability of decent, safe, and affordable housing.**

Objectives:

1. Increase the supply of assisted housing units by applying for the maximum number of new Housing Choice Vouchers, when made available by HUD.
2. Adopt strategies that maintain the maximum program size of the Housing Choice Voucher program when faced with budget constraints.

3. Enhance housing opportunities for voucher holders through outreach to participating communities and to build effective relationships with local municipalities through expansion of the Inner-Ring Suburbs consortium.
4. Maximize the supply of public housing units by maintaining a vacancy rate, adjusted for modernization, of 3% or less.
5. Maximize the supply of public housing units by reducing the average vacant unit turnaround time to less than a 30-day average by 2012.
6. Leverage private or other public funds to create additional public housing units by submitting Low Income Housing Tax Credit applications for new development projects of more than 40 units.
7. Acquire or build 120 new units of public housing by utilizing Replacement Housing Factor (RHF) funds by 2014.
8. Acquire or build at least 60 new units of public housing through the Neighborhood Stabilization Program (NSP) 2 Consortium in target areas, if funded by HUD.
9. Continue to effectively administer replacement voucher program for HUD enforcement actions, as needed.

**B. Manage the properties and physical assets of the Authority in an accountable and responsible manner always striving to meet the highest standards.**

**Objectives:**

1. Improve public housing management by striving for high-performer status while maintaining standard performance level as measured by PHAS.
2. Improve voucher management by continuing to achieve high-performer status as measured by SEMAP, given appropriate funding from HUD.
3. Continue the modernization of public housing units by renovating 150 units/year through Capital Fund Program (CFP).
4. Address deferred maintenance issues and need to demolish or dispose of obsolete public housing at Garden Valley, Cedar Extension, Lakeview Terrace, and Woodhill Homes by creating redevelopment plans and seeking funding opportunities, including HOPE VI assistance if available.
5. Provide replacement public housing in accordance with CMHA Replacement Housing Policy to fullest extent possible with available resources.
6. Improve interactive aspects of CMHA website, and develop additional web-based services for 24/7 information availability to the public.
7. Implement an IVR telephone system to increase the provision of telephone-based services to HCVP landlords, participants and the public by 2010.
8. Increase housing choices by applying for mobility vouchers and counseling grants, and by maintaining and increasing the voucher homeownership program by adding 10 new participants annually.
9. Increase housing choices by implementing site-based waiting lists for the Public Housing program by 2012.

**C. Improve the living environment and quality of life for residents of Public Housing.**

**Objectives:**

1. Maintain a Police and Security force that is responsive to the safety of residents and security of CMHA property.
2. Implement public housing security improvements by continuing to upgrade physical security systems (access control and cameras) and lighting at CMHA properties.
3. Continue to provide housing dedicated to the needs of elderly persons by maintaining the designation of certain developments through a Designated Housing Plan for the Elderly with HUD.
4. Implement the Voluntary Compliance Agreement with HUD to make Public Housing units (5%), offices, common areas, and sites fully accessible by UFAS standards for persons with disabilities.
5. Ensure equal opportunity and affirmatively further fair housing by undertaking measures that ensure access to all housing programs regardless of race, color, religion national origin, sex, familial status, and disability.

6. Incorporate green technologies and sustainable practices into all new developments, and existing developments to the highest degree possible.

**D. Develop a highly skilled workforce that provides services to residents and participants with excellence and within a department structure that is flexible, efficient, and promotes teamwork.**

**Objectives:**

1. Create a new brand identity enhancing the image and identity of CMHA to connect to the community and empower residents and participants, and develop a marketing plan to enhance the brand identity of CMHA and outreach to landlords.
2. Consolidate all administrative functions into one location to improve organizational efficiency and to eliminate departmental silos.
3. Increase response time and increase quality service delivery of the Public Housing AMP structure and Housing Choice Voucher program through ongoing staff development
4. Revise the Administrative Plan for HCVP and the Admissions and Continued Occupancy Policy (ACOP) to provide guidance to staff and train staff on revisions and how to implement policy.

**E. Promote self-sufficiency and asset development of residents and participants through providing quality case management and linkages to supportive services available in the community.**

**Objectives:**

1. Raise average annual income at family properties through providing job training and economic development programs, including the Section 3, and the Minority and Female Business Enterprise programs.
2. Provide or attract supportive services to improve residents employability, including the implementation of a Youthbuild grant, which includes training in job readiness skills, occupational skills and life skills for 45 youths.
3. Provide or attract supportive services to assist youths in their transition to self-sufficient adults through programs like Reaching Individual Success in Education (RISE), which will serve 225 youth annually.
4. Continue to seek funding to increase supportive services, and enter into agreements to fill identified service gaps.
5. Maximize annual enrollment in the voucher FSS Program.

## **6.0 PHA Plan Update**

- (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:
- (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

This PHA Plan Update contains the information that the Cuyahoga Metropolitan Housing Authority (CMHA) is submitting as the Public Housing Agency Plan (PHA Plan) for FY2010, and relates the Annual PHA Plan programs and activities to CMHA's mission and goals as described in the Five-year Plan. HUD has implemented an abbreviated template for the PHA Plan beginning this year, which only requires the presentation of information that has changed from the previous year's (2009) PHA Plan. In addition to the changes and updates from 2009, this document will include a brief summary of CMHA policies that are part of the PHA Plan. All elements of the 2009 PHA Plan are available for reference at the CMHA website: [www.cmha.net](http://www.cmha.net).

This PHA Plan is being prepared in collaboration with a Resident Advisory Board comprised of Public Housing and Housing Choice Voucher Program participants. Their participation and comments are documented in Section 11.0 (f). The notice for a Public Hearing was published on August 9, 2009, and a draft of this PHA Plan was made available for public comment, including being posted on the CMHA website. The Board Chairman conducted the Public Hearing on September 23, 2009 to obtain comments, which are documented with a

response in Section 11.0 (g). The final FY2010 PHA Plan was approved by the CMHA Board of Commissioners at the October 7, 2009 Board Meeting.

**6.01 Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures** are summarized in Section 3 of the Annual Plan. Based upon the requirements of the Quality Housing and Work Responsibility Act (QHWRA) of 1998, CMHA adopted a new Admissions and Continued Occupancy Policy (ACOP) and revised Dwelling Lease for 2001. For 2010, the Public Housing program will maintain the six preference categories that were in effect for 2009. There are three high priority (1) preferences for a) victims of natural disasters; b) involuntary displacement; and c) successful completion of a substance abuse treatment or supportive housing program housed within or in partnership with CMHA, and three standard priority (2) preferences for d) homelessness {with referral letter from recognized homeless shelter}; e) working families and those unable to work because of age or disability; and f) veterans and veterans' families. For 2010, the Housing Choice Voucher program will also maintain the six preference categories that were in effect for 2009. There are three number 1-ranked preferences for a) Victims of Natural Disasters, b) HUD-directed special admissions, and c) Public Housing residents displaced by demolition or disposition actions; one number 2-ranked preference for d) Families participating in the Moderate Rehabilitation program who must relocate because the family is under-housed or has a disabled member and there are no Moderate Rehabilitation units in the appropriate size or type; and two number 3-ranked preferences for e) Referrals from Gateway program for special needs families, and f) Referred participants of Money Follows the Person Initiative (HOME Choice). There is a possibility of having to open the HCVP waiting list sometime late in the year if the current list does not have sufficient numbers to handle the high non-response rate of applicants and/or new vouchers, if they are awarded by HUD.

As part of implementing project-based management, CMHA is considering the adoption of site-based waiting lists at all public housing locations during 2010, although the only active locations for 2010 will remain at the Carver Park HOPE VI off-site locations (Eastside Homes, Union Court, Westside Homes & Gordon Square) and Valleyview HOPE VI (Tremont Pointe I and II). While CMHA has expanded screening criteria to include state criminal records, full implementation to national criminal records will depend on the cost.

CMHA plans on continuing to meet the QHWRA income targeting requirements of ensuring that 40% of new public housing occupancy and 75% of HCVP new admissions will be given to families with incomes at or below 30% of the average median income. Under deconcentration of poverty, CMHA has identified two properties (Cedar Extension and Olde Cedar) where the average income falls below the HUD prescribed formula (last year, it was only Olde Cedar). To address this issue, CMHA has chosen a strategy of working with the current residents to raise their incomes rather than adjusting it through changes to the admissions criteria.

Updated Waiting List information for the Housing Choice Voucher and Public Housing programs are provided in the following tables:

<b><i>Housing Needs of Families on the Waiting List</i></b> <i>Analysis based on July 2009 Wait List</i>			
<b>Section 8 tenant-based assistance (Housing Choice Voucher Program)</b>			
	<b><i># of families</i></b>	<b><i>% of total families</i></b>	<b><i>Annual Turnover</i></b>
Waiting list total	5,034		800
Extremely low income <=30% AMI	4,886	97.1%	
Very low income (>30% but <=50% AMI)	124	2.5%	
Low income (>50% but <80% AMI)	22	.4%	
Families with children	4,550	90.4%	
Elderly families	22	.4%	

<b>Housing Needs of Families on the Waiting List</b> <i>Analysis based on July 2009 Wait List</i>			
Families with Disabilities	139	2.8%	
Black	4,644	92.3%	
White	335	6.7%	
Other	50	1.0%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 34 (since 10/07)			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (later in year, if needed)			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (Supportive service referrals, special admissions, displaced public housing residents, Mod Rehab participants who must be relocated when there is no other Mod Rehab unit of the appropriate size, and Money Follows the Person Initiative{Home Choice})			

<b>Housing Needs of Families on the Waiting List</b> <i>Analysis based on July 2009 Waiting List</i>			
<b>Public Housing program</b>			
	<b># of families</b>	<b>% of total families</b>	<b>Annual Turnover</b>
Waiting list total	8,764		1,400
Extremely low income <=30% AMI	7,739	88.3%	
Very low income (>30% but <=50% AMI)	859	9.8%	
Low income (>50% but <80% AMI)	166	1.9%	
Families with children	2,626	30.0%	
Elderly families (62+)	225	2.6%	
Families with Disabilities	455	5.2%	
White	680	7.8%	
Black	7,940	90.6%	
Other	144	1.6%	
<b>Characteristics by Bedroom Size</b>			
1BR	5,937	67.7%	815
2 BR	2,011	23.0%	300
3 BR	592	6.8%	200
4 BR	152	1.7%	77
5 BR	59	0.7%	5
6+ BR	13	0.1%	3
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

**6.02 Financial Resources** of approximately \$283 million will be available to CMHA in FY2010 to operate and/or administer a variety of low-income housing programs. Based upon FY2009 funding levels, CMHA anticipates receiving funding or funding commitments of about \$182 million from HUD during FY2010. Of that amount, \$96 million will be for direct housing assistance payments to HCVP landlords, and about \$55 million is estimated as subsidy to support the management and maintenance operations of the public housing program. About \$25 million is anticipated to be awarded for public housing capital improvements through the Capital Fund Program (CFP) in addition to \$2 million of Replacement Housing Factor (RHF) funds.

<b>Financial Resources: Planned Sources and Uses (Estimated)</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY2010 grants)</b>		
a) Public Housing Operating Fund	55,000,000	
b) Public Housing Capital Fund	25,600,000	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	95,830,000	
f) Public Housing Drug Elimination Program	0	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)		
Replacement Housing Fund	2,100,000	
Section 8 New Construction HAP	3,140,000	
Homeownership Turnkey III	0	
Total 2009 Grants (estimated)	181,670,000	
<b>2. Prior Year Federal Grants (unobligated funds only)</b>	As of 6/30/09	
Public Housing Capital Fund (CFP)	38,300,000	Capital and Management Improvements (including Police and safety)
American Recovery and Reinvestment Act (ARRA) Capital Funds	31,600,000	Capital improvements
Replacement Housing Fund (RHF)	5,800,000	Replacement housing
HOPE VI Revitalization	0	Capital improvements, supportive services, and neighborhood revitalization
HOPE VI Demolition	0	Demolition of public housing
COPS	240,000	Police and Safety
HOME	0	Capital improvements
ROSS Service Coordinators grants	0	Services for elderly
ROSS Neighborhood Networks grant	167,000	Supportive services
21 <sup>st</sup> Century grant	100,000	Education
Youthbuild grant	675,000	Job training
Salvation Army/Y-Haven grants	0	Transitional housing
Neighborhood System of Care	156,000	Supportive services
Other misc. grants	20,000	Supportive services
Total Unobligated prior-year grants	77,058,000	

<b>Financial Resources: Planned Sources and Uses (Estimated)</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>3. Public Housing Dwelling Rental Income</b>		
Public Housing Dwelling Income	12,071,000	Public Housing operations
Homeownership Turnkey III rental income	14,000	Homeownership program operations
<b>4. Other income (list below)</b>		
Section 8 Administrative Fees	8,491,000	HCVP program administration
Section 8 New Construction revenue	1,591,000	Housing operations
<b>5. Non-federal sources (list below)</b>		
Interest	282,000	Housing operations
Miscellaneous	1,100,000	Housing operations
HCVP Contract Administration	834,000	Housing operations
Woody Woods rents	240,000	Housing operations
<b>Total Resources</b>	<b>283,351,000</b>	

Please Note:

- (1) All Federal Grants for FY2010 are estimated based upon FY2009 levels.
- (2) Grant amounts indicate unobligated balances and will not all be spent in FY2009 since HUD allows multi-year periods for obligation and expenditure.

Unobligated balances from prior year grants amount to \$77 million, mostly from HUD grant awards for capital improvement programs such as CFP, including ARRA, and RHF, which have multi-year obligation and expenditure periods, so only a portion of this amount will be used during 2010. Another \$23 million of funding from other sources is also expected, of which \$12 million is anticipated as rental income from residents. The Section 8 program will generate \$8.5 million in administrative fees, most of which is used for the administration of the Housing Choice Voucher Program. CMHA manages three Section 8 New Construction properties that will generate \$1.6 million in revenues other than subsidy, and CMHA anticipates interest income of about \$282,000 in 2010, as well as about \$834,000 from Section 8 contract administration.

**6.03 Rent Determination** policies for the Public Housing and Housing Choice Voucher Programs were revised to meet the requirements of QHWA in 2001 as part of the new ACOP and revised HCVP Administrative Plan. There are no rent determination policy changes to these documents planned for 2010, which means that CMHA will maintain minimum rent amounts for the Housing Choice Voucher program at \$50 per month and the Public Housing program at \$25 per month, with the "hardship" conditions prescribed by QHWA. In 2010, the HCVP will operate with a payment standard that falls within a range of 100% to 110% of FMR levels. CMHA adopted the new flat rent structure for public housing as of June 2002, which may be updated in 2010 based on a slightly modified criteria. CMHA has implemented the mandatory exclusions from adjusted income determination for employment and increases in earned income.

**6.04 Operations and Management** policies for the Public Housing program are reviewed annually and revised as necessary. The HCVP Administrative Plan is revised and updated annually to reflect continuing programmatic changes from HUD, and adjustments for proposed federal budget limitations. With about 8,800 families in the Public Housing program and over 14,200 families in the HCVP, considerable focus will continue to be placed on improved customer satisfaction, and filling the expected 2,200 units that will become available as a result of program turnover from both the HCVP and Public Housing program. The following table contains updated program information.

<i>Operations and Management table</i>		
<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	8,800 families	1,400
Section 8 Vouchers	14,236 units	800
Section 8 Mod Rehab	228 units	15
Special Purpose Section 8 Vouchers (list individually)	145 – Mainstream (elderly & non-elderly disabled) 105 – VASH	5
Other Federal Programs:		
Family Self Sufficiency	181 families	15
ROSS Neighborhood Network	3000 contacts	N/A
Youthbuild	45	N/A
Transitional Housing	150 men	50
Homeownership Turnkey III	31 units	3
Section 8 New Construction	570 units	60

**6.05 Grievance Procedures** for the Public Housing program and HCVP are available as supporting documents to the PHA Plan. The Public Housing grievance procedure is part of the ACOP, and the HCVP informal hearing and review procedure is part of its Administrative Plan.

**6.06 Designated Housing for Elderly and Disabled Families.** CMHA has 2510 units at sixteen properties designated for the elderly as listed in the table below. The initial designated housing plan was approved by HUD in 2001, was revised in 2003 and had additions in 2006 (Union Court) and 2008 (Riverside Park Homes senior building). HUD granted CMHA a two-year extension of the designated housing plan in 2008, and CMHA will request another two-year extension for 2010-2011. In 2010, CMHA is considering potential development projects in the Collinwood, Lee-Miles, and East Cleveland areas that might be dependent upon CMHA designating them as new elderly designated senior buildings. Through this designation, new admissions or transfers to these estates have been prioritized for the Elderly (age 62+) and Near-Elderly (age 50-61).

<i>Housing Properties Designated for the Elderly table</i>					
	<i>Development Name</i>	<i>AMP#</i>	<i>Development#</i>	<i>Units</i>	<i>Partial/Total</i>
1	Addison Square	905	OH003-034	220	Total
2	Apthorp	907	OH003-037	163	Total
3	Beachcrest	907	OH003-035	236	Total
4	Bohn Tower	908	OH003-042	264	Total
5	Cedar Extension	901	OH003-011	155	Total
6	Euclid Beach	907	OH003-052	150	Total
7	Fairway Manor	910	OH003-077	55	Total
8	King Kennedy North	904	OH003-026	176	Total
9	LaRonde	907	OH003-030	57	Total
10	Lorain Square	910	OH003-040	111	Total
11	Mt. Auburn	906	OH003-039	105	Total
12	Oakwood Villas	906	OH003-054	92	Total
13	Riverside Park Senior Bldg.	924	OH003-120	28	Partial
14	Riverview Towers	909	OH003-025	490	Total
15	Scranton Castle	909	OH003-036	160	Total
16	Eastside/Union Court Apts.	921	OH003-112	48	Partial



**6.07 Community Service and Self Sufficiency** programs are an integral part of CMHA's efforts to empower its residents to attain and sustain self-sufficiency while living in healthy communities. Programs are designed to provide residents with access to supportive services and resources needed to develop and maintain lifestyles that are economically secure. Programs range from home day care for children to supportive housing for seniors and disabled. Working with diverse community resources, job training/ placement, family and children services, educational enrichment, recreation, crime prevention, and substance abuse support are among the many services to residents. The primary goal is to support families making the transition from welfare to work and assist others to maintain healthy lifestyles. The full range of programming available to CMHA residents is listed in the services and programs table of this section.

CMHA has complied with the QHWRA requirement concerning income changes for welfare recipients through modification of its income definition in the Admissions and Continued Occupancy Plan (ACOP) and the HCVP Administrative Plan. The relevant sections have been modified to exclude the decreasing of tenant payments as a result of welfare fraud, and failure to comply with participation requirement of a self-sufficiency program. Another QHWRA provision that has been implemented is the community service requirement, which requires most non-working adult residents of public housing to perform at least 8 hours/month of community service, and is applicable for residents at all public housing properties.

**6.08 Safety and Crime Prevention** is a key component of CMHA's housing strategy. CMHA is one of a few housing authorities in the country maintaining a dedicated police force. The CMHA Police Department was nationally accredited in March 1998 with re-accreditations in 2001, 2004 and 2007. The CMHA Police Department engages in active law enforcement, prevention efforts and interventions with residents. The Department is organized into two (2) functions: Patrol and Administration. In addition to Basic Patrol services, it operates a Crime Suppression Unit, a K-9 Unit and maintains a part-time SWAT Unit. Officers are deployed onto family estates to engage in community policing strategies and utilize the SARA model for identifying and resolving problems.

The CMHA Police Department maintains a communications/dispatch center to answer calls for service generated from residents. It also operates an Internal Affairs Unit to investigate integrity concerns and a Safety Management Unit that conducts agency-wide risk analysis. CMHA Police partners with various community resources to provide prevention and intervention programs for residents. The CMHA Police Department also participates in various multi-jurisdictional task forces with local, state and federal law enforcement agencies. The Department maintains a mutual aid agreement with the City of Cleveland Division of Police to coordinate joint investigations, and the City provides baseline services to CMHA communities.

HUD has terminated the Public Housing Drug Elimination Program (PHDEP), which provided a funding source for combating drug and gang-related issues that continue to plague CMHA communities. Nonetheless, CMHA has found alternative methods to continue funding police efforts and focus on security measures, which include camera surveillance, resident safety committees, and referrals to social services.

**6.09 Pets.** CMHA's Pet Policy is included in the ACOP, which was amended in 2001 to include family properties in accordance with a QHWRA requirement and HUD's Final Rule. In 2002, CMHA added a provision that allows dogs and cats within the specified size limitations at single-family scattered site housing units. In 2009, in accordance with the Voluntary Compliance Agreement, CMHA amended the Pet Policy to clarify the definition of an "assistance animal" and the conditions that apply to them.

**6.10 Civil Rights Certification** is included with CMHA Plan Certifications.

**6.11 Fiscal Year Audit** of CMHA for the period ended December 31, 2008 was completed in July 2009 and submitted to the Auditor of State. The independent auditor gave CMHA an unqualified opinion on the 2008 financial statements with no audit findings. CMHA has received an unqualified opinion on both its balance and income statements since 2000. The Audit report is available for review as supporting documentation to the PHA Plan.

**6.12 Asset Management** is a key component to CMHA's planning efforts. To comply with the new Operating Fund Final Rule and meet the "stop-loss" criteria that minimizes the subsidy loss under this new rule, CMHA started operating under a new Project Based Accounting and Management (PBAM) system as of October 1, 2006, and submitted a "stop-loss" package to HUD in October 2007, which was eventually approved. This asset management approach involves the continuous and on-going review of the physical, fiscal, and management performance of each property. The criteria for this successful conversion to project-based management included the implementation of: project-based accounting, project-based management, a central office cost center, centralized services, review of project performance, capital planning, and risk management responsibilities related to regulatory compliance. As another step of implementing PBAM, CMHA created Asset Management Project (AMP) groupings of estates based on geographical and size criteria. The initial AMP groupings that HUD approved for CMHA in 2007 along with additional new AMPs for Gordon Square, Riverside Park Homes, Tremont Pointe I and II (Valleyview HOPE VI), Riverview Replacement Scattered Sites (until transferred to the Small and Scattered Sites AMP) and Garden Valley Phase I will be in effect for 2010. A complete AMP listing is included in the table below. CMHA also plans on conducting a physical needs assessment in 2010 to update the deferred maintenance and modernization issues at all properties, which will allow for better planning and management of operating and capital funds.

**Asset Management Project (AMP) groupings for 2010:**

CMHA ACC Units - 6/30/09			Type:		Bedroom Size:							
AMP	Property Name	OH #	Family	Hi-rise	0	1	2	3	4	5	6	TOTAL
901	CEDAR EXTENSION	3011	241	156	0	104	98	108	87	0	0	397
901	CEDAR EXTENSION Ext.1	3023	12	0	0	0	0	12	0	0	0	12
901	OLDE CEDAR	3014	312	0	0	39	181	86	6	0	0	312
901	OLDE CEDAR MROP	3088	238	0	0	15	158	65	0	0	0	238
901	Cedar Central		803	156	0	158	437	271	93	0	0	959
902	OUTHWAITE (Ext.1)	3003	246	0	0	63	116	57	10	0	0	246
902	OUTHWAITE (Miracle Village)	3015	167	0	12	26	96	14	19	0	0	167
902	OUTHWAITE (MROP)	3096	224	0	0	28	101	75	20	0	0	224
902	OUTHWAITE (HOPE VI)	3108	111	0	0	15	39	37	20	0	0	111
902	Outhwaite		748	0	12	132	352	183	69	0	0	748
903	CARVER PARK	3007	251	0	0	103	84	44	20	0	0	251
903	CARVER PARK (MROP)	3092	217	0	0	28	64	101	16	8	0	217
903	CARVER PARK HOPE VI - I	3110	190	0	0	9	55	70	55	1	0	190
903	CARVER PARK HOPE VI - II	3115	89	0	0	3	30	25	30	1	0	89
903	Carver Park		747	0	0	143	233	240	121	10	0	747
904	KING KENNEDY NORTH	3026	0	186	0	184	2	0	0	0	0	186
904	KING KENNEDY SOUTH	3018	24	355	127	186	42	24	0	0	0	379
904	RENAISSANCE (KKS MROP)	3086	66	0	0	0	0	36	20	10	0	66
904	DELANEY (KKS HOPE VI)	3107	126	0	0	0	18	90	12	6	0	126
904	PHOENIX VILLAGE Ph. 1	3109	45	0	0	0	9	29	7	0	0	45
904	PHOENIX VILLAGE Ph. 2	3114	53	0	0	0	11	31	11	0	0	53
904	King Kennedy		314	541	127	370	82	208	52	16	0	855

<u>AMP</u>	<u>Property Name</u>	<u>OH #</u>	<u>Family</u>	<u>Hi-rise</u>	<u>0</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>TOTAL</u>
905	ADDISON SQUARE	3034	0	226	0	225	1	0	0	0	0	226
905	SPRINGBROOK	3022	24	204	16	188	24	0	0	0	0	228
905	SUPERIOR TERRACE	3076	0	0	0	0	0	0	0	0	0	0
905	WADE APTS.	3021	37	196	6	190	37	0	0	0	0	233
905	WILLSON APTS.	3024	56	242	160	81	1	24	32	0	0	298
<b>905</b>	<b>Hough</b>		<b>117</b>	<b>868</b>	<b>182</b>	<b>684</b>	<b>63</b>	<b>24</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>985</b>
906	GARDEN VALLEY (original)	3013	183	0	0	19	84	18	62	0	0	183
906	GARDEN VALLEY (Ext.1)	3019	96	0	0	30	54	12	0	0	0	96
906	GARDEN VALLEY (Ext.2)	3020	100	0	0	25	45	24	6	0	0	100
906	GARDEN VALLEY (Ext.3)	3027	28	0	0	10	18	0	0	0	0	28
906	MILES-ELMARGE	3041	0	140	0	139	1	0	0	0	0	140
906	MT. AUBURN MANOR	3039	0	109	0	108	1	0	0	0	0	109
906	OAKWOOD GARDENS	3074	25	0	0	0	0	25	0	0	0	25
906	OAKWOOD VILLA	3054	0	92	0	91	1	0	0	0	0	92
906	UNION SQUARE	3044	0	174	0	173	1	0	0	0	0	174
<b>906</b>	<b>Southeast</b>		<b>432</b>	<b>515</b>	<b>0</b>	<b>595</b>	<b>205</b>	<b>79</b>	<b>68</b>	<b>0</b>	<b>0</b>	<b>947</b>
907	APTHORP TOWER	3037	0	167	0	166	1	0	0	0	0	167
907	BEACHCREST TOWER	3035	0	245	19	186	40	0	0	0	0	245
907	EUCLID BEACH GARDENS	3052	0	150	0	149	1	0	0	0	0	150
907	LARONDE APTS.	3030	0	60	12	48	0	0	0	0	0	60
907	WOODHILL HOMES	3004	496	0	0	139	267	85	0	5	0	499
<b>907</b>	<b>Eastside</b>		<b>496</b>	<b>622</b>	<b>31</b>	<b>688</b>	<b>309</b>	<b>85</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>1118</b>
908	BOHN TOWER	3042	0	267	0	266	1	0	0	0	0	267
908	LAKEVIEW TERRACE	3016	505	0	0	153	206	124	18	0	4	505
908	LAKEVIEW TOWER	3031	0	213	0	212	1	0	0	0	0	213
<b>908</b>	<b>Downtown</b>		<b>505</b>	<b>480</b>	<b>0</b>	<b>631</b>	<b>208</b>	<b>124</b>	<b>18</b>	<b>0</b>	<b>4</b>	<b>985</b>
909	CRESTVIEW APTS.	3017	0	223	2	119	102	0	0	0	0	223
909	MANHATTAN TOWER	330B	0	29	5	24	0	0	0	0	0	29
909	PARK DENISON	330A	0	39	4	35	0	0	0	0	0	39
909	RIVERVIEW FAMILY	3078	8	0	0	0	0	0	0	0	8	8
909	RIVERVIEW TOWER	3025	0	537	16	519	2	0	0	0	0	537
909	SCRANTON CASTLE	3036	0	63	0	62	1	0	0	0	0	63
909	SCRANTON EXTENSION	353A	0	102	0	102	0	0	0	0	0	102
909	WEST BOULEVARD	353B	0	120	0	119	1	0	0	0	0	120
<b>909</b>	<b>Near West</b>		<b>8</b>	<b>1113</b>	<b>27</b>	<b>980</b>	<b>106</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>1121</b>
910	BELLAIRE GARDENS	3033	0	285	167	116	2	0	0	0	0	285
910	BELLAIRE TOWNHOUSES	3071	60	0	0	0	0	32	28	0	0	60
910	FAIRWAY MANOR	3077	0	55	0	54	1	0	0	0	0	55
910	LORAIN SQUARE	3040	0	111	0	110	1	0	0	0	0	111
910	RIVERSIDE PARK	3008	409	0	0	37	237	110	25	0	0	409
<b>910</b>	<b>Far West</b>		<b>469</b>	<b>451</b>	<b>167</b>	<b>317</b>	<b>241</b>	<b>142</b>	<b>53</b>	<b>0</b>	<b>0</b>	<b>920</b>
911	BELLAIRE EIGHT	3116	8	0	0	8	0	0	0	0	0	8
911	HARVARD TOWNHOUSES	3044	6	0	0	0	0	6	0	0	0	6
911	JEFFERSON-WEST 5TH	3050	18	0	0	0	0	14	4	0	0	18
911	LANDON	3038	10	0	0	0	0	10	0	0	0	10
911	WALTON PLACE	3038	12	0	0	0	0	12	0	0	0	12
911	MILES SCATTERED	3041	1	0	0	1	0	0	0	0	0	1

<u>AMP Property Name</u>	<u>OH #</u>	<u>Family</u>	<u>Hi-rise</u>	<u>0</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>TOTAL</u>
911 NOAH EAST	3072	10	0	0	0	0	6	4	0	0	10
911 PURITAS GARDENS	3056	24	0	0	0	0	24	0	0	0	24
911 PURITAS GARDENS EXT.	3117	6	0	0	0	0	6	0	0	0	6
911 RIVERVIEW REPLACEMENT	3118	86	0	0	34	8	35	9	0	0	86
911 SCATTERED HOMES	3106	49	0	0	0	4	32	13	0	0	49
911 SCATTERED REHAB.	3073	153	0	0	0	61	88	4	0	0	153
911 SCATTERED TOWNHOUSES	3075	54	0	0	0	0	54	0	0	0	54
911 WOODHILL SCATTERED	344A	17	0	0	0	0	2	13	0	2	17
911 WOODHILL SHALE (Sunrise)	342A	14	0	0	0	0	0	8	0	6	14
<b>911 Small or Scattered</b>		<b>468</b>	<b>0</b>	<b>0</b>	<b>43</b>	<b>73</b>	<b>289</b>	<b>55</b>	<b>0</b>	<b>8</b>	<b>468</b>
920 ADDISON TOWNHOUSES	3032	36	0	0	0	0	8	21	0	7	36
921 EASTSIDE HOMES (CHN)	3112	48	0	0	0	9	32	7	0	0	48
921 UNION COURT (CHN)	3119	0	48	0	48	0	0	0	0	0	48
922 WESTSIDE HOMES (CHN)	3111	38	0	0	12	26	0	0	0	0	38
923 GORDON SQUARE (CHN)	3113	58	0	0	58	0	0	0	0	0	58
924 RIVERSIDE PARK HOMES	3120	62	28	0	24	10	38	18	0	0	90
925 TREMONT POINTE I (MBS)	3121	51	0	0	6	34	9	2	0	0	51
926 TREMONT POINTE II (MBS)	3122	44	0	0	0	25	17	2	0	0	44
<b>PUBLIC HOUSING TOTAL</b>		<b>5444</b>	<b>4822</b>	<b>546</b>	<b>4871</b>	<b>2423</b>	<b>1756</b>	<b>609</b>	<b>34</b>	<b>27</b>	<b>10266</b>
-- Family		53.0%	47.0%	12	843	2102	1756	609	34	27	5383
-- Highrise				534	4028	321	0	0	0	0	4883

The ACC unit counts in this table reflect the Public Housing program's unit inventory as of September 30, 2009. There will be an additional AMP (927) added in late 2010 for Garden Valley I, which will have 81 public housing units. Although Riverview Replacement (AMP 911 – OH003118) shows 86 units, there will be 89 units for 2010.

**6.13 Violence Against Women Act (VAWA).** CMHA provides services to assist the child and adult victims of domestic violence and to help them maintain their housing. When the CMHA Police are called into a domestic violence situation at a public housing property, they make an immediate referral to Mental Health Services, who provide follow-up, counseling, and assure that the appropriate resources are in place to assist the victim and any children. They also interact with CMHA staff, who will assist in resolving potential safety issues and transfer actions. CMHA also provides case management services for domestic violence victims through our Self Sufficiency Coordinators that are located at each public housing AMP, which includes making referrals to agencies that have been identified as offering assistance to such victims.

CMHA has incorporated the appropriate provisions, including notification, from the Violence Against Women Act (VAWA) into the ACOP and HVCP Administrative Plan. Both the Public Housing and Housing Choice Voucher programs have notified residents/participants that the provisions of VAWA have been adopted in these policy documents and whom they should contact in the event they are a victim of or are facing lease violations for an actual or threatened domestic abuse incident. In the last year, CMHA has not knowingly denied any person for housing due to their being a victim of domestic violence.

## **7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.** *Include statements related to these programs as applicable.*

**7.0 (a). Hope VI or Mixed Finance Modernization or Development.** A Capital Fund Program (CFP) annual statement for 2010 and a CFP five-year action plan through 2014 are attachments to this PHA Plan. These statements summarize CMHA strategies for maintaining and improving the public housing stock. Due to fiscal year timing differences, CMHA will be funding most of its capital improvement activities during 2010 with FY2009 and prior year CFP funds. CMHA has based the CFP annual and five-year plans for FY2010 on the FY2009 funding amount of \$26 million. The needs and priorities for these plans were developed through input from residents and management, and were based on prior capital needs studies and maintenance inspections.

During 2009, CMHA plans to have closed out the two remaining **HOPE VI** grants for Riverview/Lakeview and Valleyview. Also during 2009, CMHA plans to submit a HOPE VI application to HUD for Garden Valley in order to complete Revitalization Plan activities for this property, which includes demolition, new replacement housing on and off site, and homeownership opportunities. Depending on funding availability and whether the 2009 HOPE VI application is successful, CMHA will consider submitting a FY2010 HOPE VI application for Garden Valley. However, CMHA will also initiate master planning exercises at Cedar Extension/Olde Cedar and/or Woodhill Homes for a potential redevelopment project that could result in a HOPE VI application in 2010. The following summary provides the status of CMHA's four HOPE VI revitalization grants:

### **1. King-Kennedy/Outhwaite (1993)**

- OH003-018 & OH003-003/015
- Status of grant: Closed
- Summary:
  - Conversion of King Kennedy South highrise into the Carl B. Stokes Social Services Mall {1996} that houses social service programs (originally 20 partners) and transitional housing programs (currently Y-Haven and Salvation Army)
  - Modernization of 126 units at King Kennedy South /Delaney Village {1997}
  - Modernization of 149 units at Outhwaite (with 58 unit reductions) {1998}
  - Modernization of 111 units at Outhwaite (with 27 units reductions) {2002}
  - Rehabilitation of Louis Stokes Community Center {2004}

### **2. Carver Park (1995)**

- OH003-007 (OH003-110 & 115)
- Status of grant: Closed
- Summary:
  - Demolition of 610 units {2002 – 2004}
  - Transfer of land to the Friendly Inn for construction of new Community Center {2003}
  - Construction of 279 new townhouse units on-site {2005}
  - Construction of 96 new units (48 scattered & 48 unit senior building) as Eastside off-site {2005}
  - Rehabilitation of 38 units (3 buildings) as Westside off-site {2005}
  - Rehabilitation of 58 units (Gordon Square) as Westside off-site {2006}
  - Provided 102 families with second mortgage assistance in Homeownership Zone

### **3. Riverview/Lakeview (1996)**

- OH003-025 & OH003-016
- Status of grant: close-out process initiated 2009
- Summary:
  - Acquired 54 scattered site replacement units to relocate Riverview families {1998}

- Demolished 135 family units at Riverview {2000}
- Modernization of phase one (56 units) at Lakeview Terrace {2003}
- Modernization of phase two (64 units) at Lakeview Terrace {2006}
- Rehabilitation of Lakeview Terrace Community Center {2007}
- Acquired 86 scattered site replacement units for Riverview {2009}
- Modernization of phase three (66 units) at Lakeview Terrace {2009}

#### **4. Valleyview /Tremont Pointe (2003)**

- OH003-001 (OH003-121 & OH003-122)
- Status of grant: close-out process initiated 2009
- Summary:
  - Demolished 243 units {2005}
  - Received 9% Low Income Housing Tax Credits for Phase I {2005}
  - Phase I construction of 102 rental units (51 public housing) {2007}
  - Received 9% Low Income Housing Tax Credits for Phase II {2007}
  - Phase II construction of 87 rental units (44 public housing) {2009}
  - Make land available for Ohio-Erie Canal Corridor trails {2009}

In 2009, CMHA was awarded \$35 million of additional CFP funds under the **American Recovery and Reinvestment Act (ARRA)** and will obligate all of these funds by March 2010. CMHA chose to utilize these funds on six major projects: 1) Phases I and II of the Garden Valley redevelopment project; 2) ADA upgrades to modify 194 units including site improvements and common areas in accordance with VCA for years 1 (2009) and 2 (2010); 3) vacancy reduction of 130 units that have been in modernization status including upgrade of electrical service at Outhwaite and structural repairs at Willson family; 4) roof replacements for 31 buildings at six properties; 5) demolition of one building at Outhwaite and replacing it with a new 36-unit building, additional parking and green space; and 6) renovation and expansion of the long vacant Community Center building at Woodhill Homes.

During 2010, CMHA will be constructing new public housing/tax credit units at Garden Valley Phase I (81 units) and Garden Valley Phase II (57 units) as **mixed-finance projects** utilizing 4% Low Income Housing Tax Credits. CMHA is planning to implement other mixed-finance projects in 2010, which could include Garden Valley Phase III, and/or potential projects in the Buckeye-Woodland, Glenville, Collinwood or Lee-Miles areas of Cleveland and East Cleveland.

CMHA will continue to seek other development opportunities for creating replacement housing. During 2010, CMHA plans on developing 10 scattered site green units (some UFAS) on vacant parcels owned by CMHA. Another potential source is the Neighborhood Stabilization Program 2 where CMHA as part of a consortium with the City of Cleveland, Cuyahoga County and the Cuyahoga County Land Reutilization Corp. submitted an application to HUD in 2009 where CMHA would play a key role in developing low-income rental units as part of the rental project development aspect of the plan.

Another source of public housing development or replacement activities available to CMHA are **Replacement Housing Factor (RHF)** funds that are provided on a formula basis by HUD for demolished public housing units. CMHA has Replacement Housing Factor (RHF) plans that include the construction of Garden Valley replacement units, the acquisition of apartment buildings and scattered site units, and/or the development of new public housing units at potential projects under discussion in the Buckeye/Woodland, Glenville, Collinwood, and Lee-Miles neighborhoods of Cleveland, and East Cleveland.

CMHA will utilize its development entity, the **Western Reserve Revitalization and Management Company**, for financing and ownership of mixed-finance development projects. This includes the development and

construction of a Central Office facility on Kinsman Avenue and East 80<sup>th</sup> Street, which will be primarily financed through a bond issuance.

CMHA has also leveraged a portion of its annual CFP grant funds to finance additional development/modernization activities through the **Capital Fund Financing Program (CFFP)**. In 2007, CMHA realized \$14 million from a bond-leveraging project with the Ohio Housing Finance Agency to fund the modernization of 66 units at Lakeview Terrace, balcony repair and window replacement at Olde Cedar, replacement of roofs at Olde Cedar, and major elevator repairs at several properties. In 2009, CMHA realized \$19.5 million from a bond-leveraging project with Fannie Mae to fund Garden Valley Phase I, ADA upgrades to modify 154 units including site improvements and common areas in accordance with VCA for years 3 (2011) and 4 (2012) and the modernization of two buildings at Outhwaite.

**7.0 (b). Demolition and/or Disposition** activities have occurred at several CMHA properties since 1995 resulting in the demolition of 1,598 units under HUD-approved plans. Through 2009, CMHA will have demolished 610 units at Carver Park, 270 units at King Kennedy North, 243 units at Valleyview, 221 units at Garden Valley, 135 units at Riverview, 102 units at Outhwaite, 6 units at Harvard-East 113<sup>th</sup>, 6 units at Riverside Park, 5 Scattered Site units, and 2 units at Puritas Gardens. One building (61 units) has been approved for demolition at Outhwaite, which will be replaced by a smaller 36 unit building, additional parking and some green space. During 2010, new demolition plans will be developed for 128 units at Garden Valley that will be needed for the third phase of redevelopment, two (2) additional houses from Scattered Homes, the old Boiler Plant at Lakeview Terrace, a maintenance building at Outhwaite, and if necessary the 8 remaining family units at Riverview due to the riverbank stability issue. CMHA is also considering redevelopment projects that could result in demolition plans at Cedar Extension for part of up to all of the family units, at Lakeview Terrace for up to 7 buildings (116 units) located east of West 25<sup>th</sup> Street, and at Woodhill Homes for up to 13 buildings (94 units) identified as Village D in the Master Plan.

CMHA has an approved disposition plan to transfer vacant land at Garden Valley for mixed-finance development of Phase I, and is in the process of disposing of the remaining vacant land at Valleyview for the Towpath Trail. During 2010, CMHA will develop disposition plans to transfer land at Garden Valley for the mixed-finance development of Phases II and III, and is also considering proposals that might require the disposition of vacant land at the Riverview (West 25<sup>th</sup>) site for a park, a small piece of vacant land at the Broadway/Worley Scattered Townhouses, seven vacant lots from the demolition of houses in Scattered Homes, the CMHA Headquarters building and vacant land on West 25<sup>th</sup> Street, and other parcels of vacant land along Superior Ave. between East 81<sup>st</sup> and East 90<sup>th</sup> Streets.

<b><i>Demolition/Disposition Activity Description table</i></b>								
	<i>1a.</i>	<i>1b.</i>	<i>2.</i>	<i>3.</i>	<i>4.</i>	<i>5.</i>	<i>6.</i>	<i>7.</i>
<b>AMP</b>	<b>Development</b>	<b>Dev#</b>	<b>Type</b>	<b>Status</b>	<b>Date</b>	<b>Effected Area</b>		<b>Timeline</b>
901	Cedar Extension (Family)	OH003-011/023	Demo	Planned	1/10	59 units 7 bldgs.	Part	1-12/10
902	Outhwaite (Bldg.#3)	OH003-015	Demo	Approved	8/09	61 units 1 bldg.	Part	9/09-5/10
902	Outhwaite	OH003-003	Demo	Planned	4/10	Maint. Bldg.	Part	1-12/10
905	Superior Terrace	OH003-076	Dispo	Planned	6/10	Vacant land	Part	1-12/10
906	Garden Valley (Phase I)	OH003-013	Dispo	Approved	7/09	Vacant land	Part	8/09-12/10
906	Garden Valley	OH003-	Demo	Planned	1/10	128 units	Part	1-12/10

	(Phase 2)	013/020				12 bldgs.		
906	Garden Valley (Phase II)	OH003- 013/020	Dispo	Planned	11/09	Vacant land	Part	1-12/10
906	Garden Valley (Phase III)	OH003- 013/020	Dispo	Planned	4/10	Vacant land	Part	1-12/10
907	Woodhill Homes	OH003- 004	Demo	Planned	8/10	94 units 13 bldgs.	Part	1-12/10
908	Lakeview Terrace	OH003- 016	Demo	Planned	8/10	116 units 7 bldgs.	Part	1-12/10
908	Lakeview Terrace	OH003- 016	Demo	Planned	4/10	Boiler Plant	Part	1-12/10
908	Administrative Headquarters	OH003- 031	Dispo	Planned	9/10	1 Bldg & land	Part	1-12/10
909	Riverview	OH003- 025	Demo	Planned	9/10	8 units 1 bldg.	Part	1-12/10
909	Riverview	OH003- 025	Dispo	Planned	7/10	Vacant land	Part	1-12/10
911	Scat. T'houses – Broadway/Worley	OH003- 075	Dispo	Planned	1/10	Vacant land	Part	1-12/10
911	Scattered Homes	OH003- 106	Demo	Planned	1/10	2 units	Part	1-12/10
911	Scattered Sites	OH003- 073,106	Dispo	Planned	4/10	7 vacant parcels	Part	1-12/10
941	Valleyview	OH003- 001	Dispo	Planned	1/10	Vacant land	Part	1-12/10

**7.0 (c). Conversion of Public Housing** requirement for mandatory conversions still does not apply to any CMHA property. The Required Initial Assessments for voluntary conversions were completed by October 1, 2001 for the applicable estates, and CMHA determined that none of the covered estates are appropriate for conversion.

**7.0 (d). Homeownership**, CMHA has been operating the Turnkey III Homeownership program since 1971, and of the 385 original units, 31 homes remain unsold as of July 2009, which CMHA will request that HUD convert to public housing rental units. To help address a housing need identified in our housing needs analysis, CMHA implemented a HCVP homeownership program in 2003. As of June 2009, 60 families had purchased homes through the HCVP program. CMHA is also developing a homeownership program for the Riverview replacement scattered site public housing units under the Final Rule guidelines issued in March 2003 that has been submitted to HUD for implementation. This plan proposes the eventual sale of 5 units, which will be replaced in accordance with CMHA policy.

**7.0 (e). Project-based Vouchers.** CMHA operates a Project-based Voucher Program utilizing tenant-based vouchers to encourage property owners to construct new standard housing (new construction) or to upgrade substandard rental housing stock (substantial rehabilitation) and make it available to lower income families in the community.

A total of four projects, representing 108 units, are currently under Project-based Voucher contracts. The HCVP maintains a Project-based Voucher waiting list from which potential tenants of Project-based units must be referred to the owners of these projects. In addition, a site-based waiting list is maintained for Emerald



Commons due to requirements that residents of this property must be chronically homeless with at least one disability.

In 2009, the HCVP released two RFPs for potential Project-based Voucher contracts totaling 150 units of existing housing for families and persons with disabilities. Three proposals were received and are under consideration for execution prior to the end of 2009.

Project-based voucher assistance provided by CMHA will be consistent with new HUD regulations, which include some of the following provisions: 1) it is capped at 25% of the dwelling units in any one building, with exceptions for single family properties and dwelling units specifically for the elderly families, families with disabilities, or families receiving supportive services; 2) project-based assistance may now be provided for a term of up to 15 years, subject to the future availability of appropriated funds; and 3) administrative requirements exist for issues concerning rents, tenant selection, family choice to move, vacant units, unit inspection and housing quality standards.

## **8.0 Capital Improvements.** Please complete Parts 8.1 through 8.3, as applicable.

**8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report.** As part of the PHA 5-Year and Annual Plan, annually complete and submit the *Capital Fund Program Annual Statement/Performance and Evaluation Report*, form HUD-50075.1, for each current and open CFP grant and CFFP financing.

These statements are attachments to this document, as required under section 11.0 (h).

**8.2 Capital Fund Program Five-Year Action Plan.** As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan*, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.

This plan is an attachment to this document, as required under section 11.0 (i).

## **8.3 Capital Fund Financing Program (CFFP).**

☒ Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.

**9.0 Housing Needs.** Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The Housing Needs analysis in conjunction with the provisions set forth in the Quality Housing and Work Responsibility Act (QHWRA) help establish the basis for the PHA Plan. The needs analysis is based upon information provided in the Consolidated Plans prepared by entitlement cities within our jurisdiction and 2000 updated census data.

Although Cuyahoga County consists of 38 cities, 19 villages, and 2 townships, planning in Cuyahoga County is unique in that a housing consortium (Cuyahoga Urban County) comprised of 46 of these communities have joined forces in analyzing their housing needs to be combined into one Consolidated Plan, which also includes information for the entitlement cities of Cleveland Heights, Euclid, Lakewood, and Parma. The City of Cleveland and the City of East Cleveland prepare individual plans and are not part of the consortium.

**9.1 Strategy for Addressing Housing Needs.** Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

As indicated in the Housing Needs tables in Section 1A of the Annual Plan, renters with incomes less than 30% of the area median income (AMI) have a great cost burden in regards to housing affordability in Cleveland, East Cleveland and the Cuyahoga Urban County. In Cleveland, 67% of renters earning less than 30% AMI pay more than 30% of income for rent and utilities. In East Cleveland, 70% of renters earning less than 30% AMI pay more than 30% income for rent and utilities. In the Cuyahoga Urban County, which comprises most of the suburban population, 76% of its renters earning less than 30% AMI pay more than 30% of income for rent and utilities.

The supply and quality of units available to lower-income renters is also a serious concern. Cuyahoga County's housing stock, particularly those units within the central city and the inner-ring suburbs, is aging and the quality of rental housing is often poor. The housing needs study also indicates that the supply and quality of affordable rental housing for families with disabilities is limited, and that there is a need for assisted and supportive services rental units for elderly families.

CMHA has adopted the following strategies to help alleviate this huge need for safe decent affordable housing in Cleveland and Cuyahoga County:

- Maximize the number of available assisted housing units by maintaining a minimal vacancy rate in the Public Housing program and a high utilization rate in the Housing Choice Voucher program
- Increase the supply of assisted housing units by developing new public housing units and applying for new vouchers as made available
- Upgrade the Public Housing stock through the effective expenditure of Capital Funds
- Achieve the 5% goal of fully accessible ADA public housing units through implementation of the Voluntary Compliance Agreement with HUD
- Continue support of the Gateway initiative that provides housing for special needs households through the Housing Choice Voucher program
- Continue to provide housing dedicated to the needs of elderly persons by maintaining the designation of certain public housing properties through the Designated Housing Plan for the Elderly with HUD
- Maintain a CMHA Police force to enhance the safety of public housing properties
- Provide economic opportunities for residents through provision of social service programs and Section 3 component of construction contracts

**10.0 Additional Information.** Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

***10.0 (a). Progress in Meeting Mission and Goals.***

For Five-Year Plan of 2005-2009 through July 2009:

**1. Public Housing program:**

- decreased vacancy rate adjusted for modernization from 3% as of 12/31/04 to 2% as of 6/30/06 and 1% as of 6/30/09
- reduced vacant unit turnaround time from 72 days in '04 to 56 days in '05 to 49 days in '06 to 44 days in '07, but back to 49 days in '08
- submitted and awarded 9% Low Income Housing Tax Credits for Phase I of Valleyview HOPE VI redevelopment in 2005, and for Phase II in 2007
- submitted and awarded 4% Low Income Housing Tax Credits for 90 new units at Riverside Park in 2006, and for 81 new units at Garden Valley in 2009
- leveraged CFP funds for a \$14 million CFFP bond project through OHFA in 2007, and through Fannie Mae in 2009 for \$19.5 million CFFP
- constructed 90 new units at Riverside Park (2007) and 8 new units at Puritas Gardens (2008) as part of Replacement Housing Factor (RHF) plan
- acquired new apartment building on Bellaire Road (8 units) in 2005
- maintained standard performer designation with PHAS scores of 79% in 2005, 83% in 2006, and 84% in 2007
- implemented full site-based accounting and management systems in 2006
- performed annual review of ACOP policies and made changes for 2005, 2006, 2007 and 2008
- concluded master planning study of Garden Valley in 2006, hired developer and submitted HOPE VI applications in 2007 and 2008
- proceeded with demolition plans: 243 units demolished at Valleyview in 2005, 8 units at Riverside Park in 2006, 2 units at Puritas Gardens, 5 Scattered Site units in 2007/2008, and 221 units at Garden Valley in 2009
- completed 1993 HOPE VI grant with completion of Outhwaite Community Center in 2005
- completed 1995 HOPE VI grant with completion of 279 on-site units at Carver Park and 192 off-site units in 2006
- will close 1996 HOPE VI grant in 2009 with acquisition of 86 scattered site replacement units for Riverview, and completion of 66 units in Phase 3 at Lakeview in 2009 after completion of Community Center renovation in 2007
- will close 2003 HOPE VI grant in 2009 with completion of a 189 unit mixed income (95 public housing) development at Valleyview/Tremont Pointe
- completed construction of 98 new units at King Kennedy North (Phoenix Village) in 2005
- maintained Designated Housing Plan for the elderly at 15 public housing properties in 2006 and extension in 2008
- received grants from foundations to provide resident services for Valleyview relocated residents in 2005 and 2006
- submitted Homeownership Plan for Scattered Sites in 2007
- implemented site based wait lists at Carver Park off-site properties in '05 & Valleyview in '07

## **2. Housing Choice Voucher (Section 8) program:**

- achieved high-performer rating from HUD with SEMAP score of 91% in 2005 and 100% in 2006, 2007, and 2008
- added 158 vouchers through HUD enforcement actions
- performed annual review of Administrative Plan policies and updated them for 2006, 2007, 2008, and 2009
- partnered with socialservice.com to list available Section 8 landlord properties
- conducted landlord conference in 2007
- maximized enrollment in voucher FSS program in 2006, 2007, and 2008
- increased sales in HCVP Homeownership program to 60 as of 6/30/09

### ***10.0 (b). Significant Amendment and Substantial Deviation/Modification.***

This section was added to the PHA Plan in 2001 and defines what significant amendments or deviations to the Plan would require resubmission of the Plan. While housing authorities may change or modify their plans and policies described in them, any “significant amendments or modification” to the plan will require the submission of a revised Agency Plan that has met the full public process requirement. CMHA will consider the following actions to be “significant amendments or modifications” with an exception allowed for actions due to changes in HUD regulatory requirements.

- Changes to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency work items (items not included in the current Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund;
- Additions of new activities not included in the current PHDEP Plan; and
- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

HUD also requires that housing authorities explain “substantial deviations” from the 5-Year Annual Plan in their Annual Plan. “Substantial deviations” to CMHA’s 5-Year Plan shall consist of the elimination of a goal or objective without being completed or a significant change to a goal or objective, represented by more than a one year change to the completion date or more than a 30% reduction of an objective activity amount.

### ***10.0 (c). Agreements with HUD.***

**Voluntary Compliance Agreement (VCA):** in March 2007, the HUD Office of Fair Housing and Equal Opportunity, conducted a review of CMHA’s compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA). HUD’s compliance review focused primarily on CMHA’s Low Income Public Housing (LIPH) Program. The review included an examination of CMHA’s LIPH application and resident files, waiting lists, reasonable accommodation requests, transfer requests, and maintenance records, as well as an accessibility review of the Administrative Office and Applications Office. HUD also reviewed a sample of eight public housing developments and conducted physical surveys of 31 dwelling units, including the designated accessible routes and access to common areas. HUD also conducted interviews with CMHA senior management staff, development managers, and residents.

Based on their review, HUD determined that CMHA is not in compliance with Section 504 or the ADA. HUD issued a Letter of Findings of Noncompliance on September 28, 2007 specifying the areas of non-compliance noted by HUD in their review. CMHA voluntarily chose not to appeal or seek a review of HUD’s findings, as was its right to do.

CMHA and HUD then participated in multiple collaborative good faith negotiation sessions that resulted in a seven (7) year Voluntary Compliance Agreement (VCA), which was executed on July 25, 2008.

The VCA will ultimately provide disabled residents of Cleveland with additional opportunities to access affordable housing and make five percent (5%) of its public housing units fully accessible for residents and applicants with disabilities. Under the agreement, CMHA will:

- Create a minimum of five percent (currently 482 units) of its housing stock into fully-accessible units that will include lower kitchen counters, ramps, grab bars, and other features of accessible design;
- Make improvements in the management of their housing wait list to maximize the availability of accessible units for disabled individuals and their families;
- Ensure that applicants and residents with disabilities who rely on assistance animals have equal, unrestricted access to CMHA's programs; and
- Train current and new employees about the responsibilities and procedures created under this agreement.

The VCA also sets forth specific reporting and recordkeeping requirements which, when implemented, will enable CMHA to track compliance with the mandates set forth in the VCA. In addition, CMHA agrees, as part of its overall efforts to provide affordable, accessible housing to persons with disabilities in its serving communities, to become an active coordinating agency in the Money Follows the Person Rebalancing Initiative (the MFP Initiative) funded through the Centers for Medicare and Medicaid Services (CMS). The goal of the MFP Initiative is to expand accessible, affordable and integrated housing options for persons with disabilities and seniors to promote the transition of these individuals out of institutional settings and into home and community-based settings.

CMHA will work closely with the local MFP Initiative network to facilitate applications by or on behalf of disabled individuals eligible for participation in the MFP Initiative. CMHA will continue to issue all set-aside Housing Choice Vouchers for otherwise qualified disabled families referred from the Gateway Access Board (GAB). Eden, Inc. serves as liaison between the GAB and CMHA, and administers the selection process. During the term of the VCA, CMHA will reissue expiring Housing Choice Vouchers issued to disabled persons referred from the GAB and that are under contract to the same family or another family referred from the GAB.

**11.0 Required Submission for HUD Field Office Review.** In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.

***11.0 (a). PHA Certifications of Compliance with the PHA Plan and Related Regulations (HUD-50077) & Civil Rights Certification (HUD-50077-CR)***

– attachment oh003a01

***11.0 (b). Certification for a Drug-Free Workplace (HUD-50070)***

– attachment oh003b01

***11.0 (c). Certification of Payments to Influence Federal Transactions (HUD-50071)***

– attachment oh003c01

***11.0 (d). Disclosure of Lobbying Activities (SF-LLL)***

– attachment oh003d01

***11.0 (e). Disclosure of Lobbying Activities Continuation Sheet (SF-LLL-A)***

– not applicable

### ***11.0 (f). Resident Advisory Board (RAB) Comments***

#### **Housing Choice Voucher Program (HCVP):**

A group of HCVP participants, which acts as the RAB, attended a meeting that was conducted on July 9. The changes proposed for each chapter of the Administrative Plan were explained by staff, and there were no comments or suggestions on any of the changes presented for the Administrative Plan.

There was one inquiry on the status of an interim re-exam, and a request for a letter to be sent to the landlord stating the interim was in process. The participant was informed that it is not Housing Authority policy to mail letters to owners regarding the status of interim changes. A letter will be mailed when the interim has been completed if there is a change in the rent amount.

There was a general inquiry regarding the FSS Program and the rules, regulations and benefits of the program were explained.

There was an inquiry involving the expiration of a Homeownership voucher. Explanation included how the homeownership program works, and the need to get any related credit/loan issues corrected timely. However, the rental voucher does not expire.

There was an inquiry regarding the value of the home for insurance premiums. The participant was informed that they had the right to choose their own insurance policy and should compare the coverage and prices of different companies for the best rates.

#### **Public Housing program:**

The Executive Committee of the Progressive Action Council (PAC), which acts as the RAB for the Public Housing program, was provided with the PHA plan and was informed there were no changes being proposed to the FY2010 PHA Plan or the Admissions and Continued Occupancy Policy (ACOP), although there were some minor changes being proposed for the HCVP Administrative Plan. There was general acceptance of the PHA Plan, as stated in a letter that offered their full support and hope for final approval and authorization.

### ***11.0 (g). Challenged Elements (of PHA Plan).***

The following is a summary of the comments that were received verbally and/or in writing during the public review process for the FY2010 PHA Plan, including the CMHA response. In addition to the Public Hearing held on September 23, 2009, CMHA also held a meeting with our community partners to discuss changes to the Housing Choice Voucher Program Administrative Plan. After publication of the draft PHA Plan and initiation of the comment period, CMHA staff suggested the following changes that have been included: the HCVP waiting list could be opened late in 2010; the Glenville area has been added as a potential development site; demolition plans might be developed for the 8 remaining Riverview family units due to riverbank instability, and for the 94 units making up the Village D area at Woodhill Homes as part of a potential redevelopment project; and \$31.4 million of unobligated ARRA CFP funds were added to the Financial Resources chart.

Written comments were submitted by Peter Iskin of the Legal Aid Society, some on the behalf of the Greater Cleveland Re-Entry Strategy Housing Workgroup, who we would again like to acknowledge for his thorough review and thoughtful comments. Since there were no policy changes proposed for the FY2010 PHA Plan, the only comments received were for proposed changes to the Housing Choice Voucher Program's Administrative Plan.

#### **1. Chapter 2, Page 2-10 and Chapter 15, Page 15-6 – Drug Related Criminal Activity**

**Comment:** “Under the Plan, a household is ineligible for admission if any member of the household has engaged in any drug-related criminal activity during the three year period before the admission decision. CMHA should revise this standard for cases in which the drug-related criminal activity is drug abuse and/or drug possession (but not drug trafficking). In these cases, the three year period should be reduced to a one year period, provided the offending household member is currently enrolled in or has successfully completed a supervised drug rehabilitation program certified by the Ohio Department of Alcohol and Drug Addiction Services. This revised standard is reasonable and would promote a long-term successful rehabilitation of the offending household member. In providing an exception for those who are enrolled in or have completed a drug rehabilitation program, it is similar to the HUD and CMHA rule for applicants who have been evicted from federally assisted housing for drug-related criminal activity.”

**CMHA Response:** While rehabilitation of offending household members is a laudable goal, the Voucher Program’s main purpose is to provide subsidy to low-income families who wish to reside in private-market housing. While mirroring policies of the public housing division of CMHA makes sense in certain situations, there are important differences between the two programs. While public housing is owned and managed by CMHA, the Voucher Program depends upon a strong working relationship with private landlords and Cuyahoga County municipalities. Without these entities, the voucher program cannot succeed. An important goal of HUD and CMHA’s Voucher Program is to encourage families, especially those with children, to move to areas of low poverty. In most cases, this means the suburbs of Greater Cleveland. Relaxing the requirements concerning drug abusers would negatively impact these efforts.

## **2. Chapter 2, page 2-10 and Chapter 15, Page 15-6 – Serious Violent Criminal Activity**

**Comment:** “Under the Plan, a household is ineligible for admission if any member of the household has engaged in a serious violent criminal activity and his/her release from incarceration and/or court ordered supervision, with respect that criminal activity, occurred within five years before the admission decision. CMHA should revise this standard so as to reduce the five year period to a one year period. This revised standard would make the CMHA HCVP rule consistent with the corresponding CMHA public housing rule (ACOP § 2.16 (G)). And, like the CMHA public housing rule, it is a reasonable standard that would promote successful reentry.”

**CMHA Response:** As stated above, mirroring the policies of CMHA’s public housing program is not always feasible for the voucher program. Housing available to voucher holders is not owned and managed by CMHA; it is private market housing. It is important to remember that the five year restriction concerns *serious violent* criminal activity, not other types of criminal activity. Serious violent criminal activity includes such heinous crimes as rape or murder. CMHA does not agree with the commenter that a one year standard for such serious crimes is “reasonable”. While successful reentry of criminals to the community is a laudable goal, the purpose of CMHA’s voucher program is to provide subsidy to low-income families who wish to reside in private market housing.

## **3. Chapter 4, Section K, Page 4-8 – Notice of PBV Waiting List Openings/Closings**

**Comment:** “CMHA proposes to revise its method for notifying the public of openings and closing of its PBV waiting lists. CMHA’s revised rule would require public notice only via notices (i) posted at the CMHA HCVP offices, the CMHA website, and the PBV property (for site-based waiting lists) and (ii) sent to local social service agencies. CMHA’s revised rule would eliminate the provision that now requires notice in local newspapers. If 24 CFR § 982.206(a)(2) applies to the PBV program, CMHA’s proposed revision violates this regulation and, therefore, should not be adopted. § 982.206(a)(2) requires newspaper notice for openings and closings of a HCVP waiting list. § 982.206(a)(2) seems to apply to the PBV program. 24 CFR § 983.2 states that each provision in 24 CFR part 982 applies to the PBV program, unless it is specifically excluded by § 983.2. With respect to 24 CFR part 982, subpart E (which includes § 982.206 (a)(2)), the only provisions that do not apply to the PBV program are §§ 982.202(b)(2), 982.204(d), and the provisions on issuance or use of a voucher. See 24 CFR §§ 983.2(b)(1) and 983.2(c)(1).

**CMHA Response:** This proposed change has been dropped and was omitted from the chart of changes that was submitted to the CMHA Board of Commissioners for approval. CMHA appreciates the assistance of the commenter.

#### **4. Chapter 6, Section C, Pages 6-4 to 6-5 – Minimum Rent of \$50**

**Comment:** “The Plan contains a minimum rent of \$50. CMHA should rescind this minimum rent and adopt a minimum rent of \$0 for at least two reasons. First, the financial hardship exception to the minimum rent, if applied properly, would exempt virtually all participants who have “zero income.” A financial hardship exists if “the family would be evicted because it is unable to pay the minimum rent.” 24 CFR § 5.630(b)(1)(ii). *See also* Plan at 6-4 (Hardship Request for an Exemption to Minimum Rent). Participants who have “zero income” are unable to pay the \$50 minimum rent and, beyond the short-term, would be (and often are) evicted for nonpayment of the \$50 minimum rent. In the short-term, these tenants often rely on a gift or borrowed money from a relative or friend to pay the minimum rent. The relative or friend is not obligated to make this gift or to lend this money, and does so only to permit the tenant to pay the \$50 minimum rent. Beyond the short-term, the relative or friend often discontinues this assistance. These gifts and loans are not income, for HCVP purposes. Income does not include: “temporary, nonrecurring or sporadic income (including gifts).” 24 CFR § 5.609©(9). Participants who have “zero income” often receive a utility reimbursement, which is assistance for the participant’s payment of utility bills. A participant’s failure to pay utility bills, and the resulting termination of utility services, is a breach of the participant’s HCVP obligations. 24 CFR §§ 982.404(b)(3), and 982.552(c). Therefore, the HCVP rules do not permit these participants to use their utility reimbursement to pay a minimum rent, instead of a utility bill. The foregoing means that, if CMHA properly applies the financial hardship exception, few participants would be required to pay the \$50 minimum rent. This, in turn, means that the \$50 minimum rent would impose a significant administrative burden on CMHA, without significantly reducing CMHA’s subsidy amount per participant. Second, a \$50 minimum rent is an unfair policy. It creates a rent formula that requires the families that have the least income to pay a higher percentage of their income for rent than the relatively higher income families. In addition, it requires families that have minimal (or no) income to pay an amount of rent that they cannot afford to pay.”

**CMHA Response:** Due to under-funding of the Housing Choice Voucher Program (HCVP) by HUD, and CMHA’s policy decision to maintain the size of the program, it is necessary for the HCVP to maintain a \$50 minimum rent. As relief from the minimum rent payment and in accordance with HUD requirements, CMHA offers protection from eviction through the hardship exemption.

#### **5. Chapter 9, Page 9-3 – Lawn Care and Snow Removal**

**Comment:** “CMHA proposes to revise its HCVP lease requirements for snow removal and lawn care. CMHA’s proposed revisions should be adopted. They are consistent with Ohio law and will provide participants and landlords with clear guidance on these matters.”

**CMHA Response:** CMHA appreciates the assistance of the commenter in developing a policy that is consistent with Ohio law.

#### ***11.0 (h). Capital Fund Program Annual Statement/Performance and Evaluation Report (HUD-50075.1)***

- ***FY2010 CFP – attachment oh003e01***
- ***FY2010 RHF (first increment) – attachment oh003f01***
- ***FY2010 RHF (second increment) – attachment oh003g01***
- ***FY2009 CFFP (new) – attachment oh003h01***
- ***P&E Reports on Open CFP grants – attachment oh003i01***
- ***P&E Reports on Open RHF grants – attachment oh003j01***
- ***P&E Report on Open CFFP – attachment oh003k01***
- ***P&E Report on Open ARRA CFP grant – attachment oh003l01***

#### ***11.0 (i). Capital Fund Program Five-Year Action Plan (HUD-50075.2) – attachment oh003m01***